



7920 INTERSTATE 30  
P.O. BOX 191610  
LITTLE ROCK ARKANSAS 72219-1610  
(501) 565-0179

2218 SOUTH 57TH, SUITE A  
FORT SMITH, ARKANSAS 72903-3811  
(501) 452-5266

November 18, 1997

Cynthia L. Johnson, Director  
Cash Management Policy and Planning Division  
Financial Management Service  
401 14th Street SW  
Room 420  
Washington, D. C. 20227

Re: Proposed EFT Rule 31CFR Part 208

Dear Director Johnson:

Within the provision requiring recipients *without* an account at a financial institution being provided with an Electronic Transfer Account (ETA) at a financial institution selected by the Department of Treasury, we are concerned that selection would be restricted to those financial institutions providing ATM and POS access. Currently, the accounts with such electronic access to deposited funds are most frequently charged higher fees.

Although the proposed rules indicates ETAs will be **reasonably** priced, *reasonable is not minimal*. Granted the opportunity of waiver, because of financial hardship, could be applied on a case by case basis, but it is doubtful a high percentage of recipients would understand how to apply for such a waiver. Not to mention the added costs for Treasury Department administration, and the opportunity for adding even more paper and confusion to the establishment of a new system.

It is suggested the assignment of ETAs by ZIP Code designations be considered a primary requirement, with the lowest priced ETA within that selection be a secondary condition before any others.

Sincerely,

A handwritten signature in dark ink, appearing to read "H E Garvin". The signature is fluid and cursive.

Harold E. Garvin  
President

EFT  
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